

Matthew F. Graham, State Bar No. 95194
Richard A. Sipos, State Bar No. 126982
Garret D. Murai, State Bar No. 215667
AIKEN, KRAMER & CUMMINGS, INC.
1111 Broadway, Suite 1500
Oakland, California 94607
Telephone: (510) 834-6800
Facsimile: (510) 834-9017
E-mail: gmurai@akclawfirm.com

Attorneys for Plaintiff
RICHARD TRAVERSO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RICHARD TRAVERSO,

Plaintiff,

vs.

CLEAR CHANNEL OUTDOOR, INC.; and
DOES 1 through 10, inclusive,

Defendants.

Case No. C07-3629 MJJ

**NOTICE OF MOTION AND MOTION
FOR RELIEF FROM CASE
MANAGEMENT SCHEDULE**

Date: October 30, 2007
Time: 9:30 a.m.
Courtroom: 11 (19th Floor)
Judge: Martin J. Jenkins

Action Removed: July 13, 2007
Trial Date: None

Accompanying Documents. Memorandum of
Points and Authorities; Declaration of Garret
D. Murai; [Proposed] Order re. Revised Case
Management Schedule

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 30, 2007 at 9:30 a.m. in Courtroom 11 of this
Court located at 450 Golden Gate Avenue, San Francisco, California, or as soon thereafter as this
matter may be heard, Plaintiff RICHARD TRAVERSO will move this Court for relief from the
Case Management Schedule in this action pursuant to Local Rule 16-2(d).

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AIKEN, KRAMER & CUMMINGS
INCORPORATED

1 Plaintiff's motion is made on the following grounds:

2 1. This is an unlawful detainer action. California state law provides for the
3 expedited adjudication of unlawful detainer actions. These expedited procedural rules do not
4 have a counterpart in the Federal Rules.

5 2. This Court has issued a Clerks Notice (Setting Case Management Conference in
6 Reassigned Case) setting a Case Management Conference on November 6, 2007 ("Notice"). The
7 Notice requires that Plaintiff file a Case Management Statement pursuant to Federal Rules 16
8 and 26. The Federal Rules provide different procedural rules than do California state rules
9 governing unlawful detainer actions.

10 3. Plaintiff respectfully request that this Court enter an order that California state
11 rules governing unlawful detainer actions apply to this action.

12 Plaintiff's motion is based on this Notice of Motion and Motion for Relief of Case
13 Management Schedule; the accompanying Memorandum of Points and Authorities and
14 Declaration of Garret D. Murai; and any other pleadings, documents, records, files and other
15 evidence as may be presented.

16 Dated: September 10, 2007

AIKEN, KRAMER & CUMMINGS, INC.

17
18 By

Garret D. Murai
Attorneys for Plaintiff
RICHARD TRAVERSO

PROOF OF SERVICE

Re: *Traverso v. Clear Channel Outdoor, Inc., et al.*
Case No.: C07-3629 MJJ

I, the undersigned, state that I am a citizen of the United States and employed in the City of Oakland, County of Alameda, State of California, in the office of a member of the bar of this court, at whose direction the service was made; that I am over the age of eighteen years and not a party to the within action; that my business address is 1111 Broadway, Suite 1500, Oakland, California 94607.

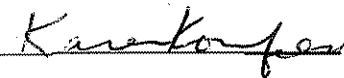
On the date set forth below, I served the following document described as:
NOTICE OF MOTION AND MOTION FOR RELIEF FROM CASE MANAGEMENT SCHEDULE
as follows to the address(es) set forth below:

Scott D. Baker
Jonah D. Mitchell
David S. Reidy, Esq.
REED SMITH LLP
Two Embarcadero Center, Suite 2000
San Francisco, CA 94111-3922
Tel: 415/543-8700
Fax: 415/391-8269

☒ **BY E-FILING:** via the court-mandated e-filing service.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: September 20, 2007


Karen Kornfeld

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